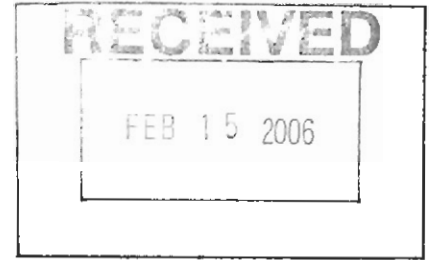


United States District Court
for the
District of Delaware



Ashley T. Adams
716 North Barrett Lane
Christiana, DE 19702

Plaintiff,

V

Case No. 04 251 JJF

JoEllen Capen Sheldon
708 Pebble Beach Drive
Elkton, MD 21921

Defendant.

MOTION TO DENY RECORDS DEPOSITION

1.

On January 30, 2006, Defense Counsel, Beth H. Christman, files a notice of records deposition *duces tecum* in accordance with a subpoena served on RiteAid and Eckerd Corporation January 26, 2006 for date of action February 20, 2006 at 9:00AM.

2.

Plaintiff is currently and has been unrepresented by counsel since December 2005, and this is known by defense counsel. Defense counsel files this motion and subpoena knowingly that Plaintiff is not represented.

3.

Plaintiff receives copy of the notice of the records deposition via first class mail from Kevin Healy's Law Office, plaintiff's attorney on record, but not participating in Plaintiff's case. Mr. Healy informed Plaintiff in December 2005, while on the record as Plaintiff's attorney; he would not work on Plaintiff's case while the Motion to withdraw his appearance is waiting a decision by the Court.

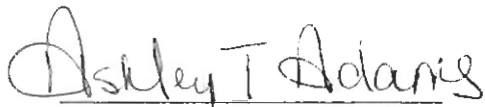
4.

Plaintiff does not have access to Plaintiff's records that are still located at Kevin Healy's office, therefore, Plaintiff acting as *pro se*, until Plaintiff can seek other counsel or move forward as *pro se*; a decision that Plaintiff was just informed of by the Court.

5.

Defense Counsel moved this motion knowing that Plaintiff was unrepresented, not giving the Plaintiff the opportunity to either respond or prepare and is suspect as to why defense counsel had over 4 years to obtain records, but seeks records during a time when Plaintiff is unrepresented.

Wherefore, Plaintiff asks the Court to deny records deposition.

A handwritten signature in cursive script, reading "Ashley T. Adams". The signature is written in dark ink and is positioned above the printed name and address.

Ashley T. Adams
716 North Barrett Lane
Christiana, DE 19702

Certificate of Service

I, Ashley T. Adams, certify that I have mailed Motion to Deny Records Deposition, first class mail, on February 13, 2006 to:

The United States District Court
For the District of Delaware
The Honorable Judge Joseph J Farnan, Jr
844 N. King Street
Lock Box 44
Wilmington, DE 19801

Beth H. Christman, Esq.
CASARINO, CHRISTMAN & SHALK, P.A.
800 N. King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899

Ashley T Adams
2/13/2006

**United States District Court
for the
District of Delaware**

**Ashley T. Adams
716 North Barrett Lane
Christiana, DE 19702**

Plaintiff,

V

Case No. 04 251 JJF

**JoEllen Capen Sheldon
708 Pebble Beach Drive
Elkton, MD 21921**

Defendant.

MOTION TO DENY RECORDS DEPOSITION

On, _____, 2006, Motion to Deny Records Deposition is so ORDERED.

Judge Joseph Farnan, Jr.